

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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SEP 18 2013

CLERK, U.S. DIST. COURT  
WESTERN DIST. OF TENN

Tara Nicole Pread

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. \_\_\_\_\_

First Tennessee Bank /

First Horizon National /

FTN Financial

(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Tara Nicole Pread

(name of plaintiff)

is a citizen of the United States and resides at 7073 Glencagles Dr.  
(street address)

Memphis

(city)

U.S.A.

(country)

TN

(state)

38141

(zip code)

(901) 628-1331

(telephone number)

3. Defendant First Tennessee Bank

(defendant's name)

lives at, or its business is located at 165 Madison Ave. 3rd Floor

(street address)

Memphis, TN 38103

4. Plaintiff sought employment from the defendant or was employed by the defendant at

845 Crossover Ln. Ste 150

(street address)

Memphis

(city)

U.S.A.

(country)

TN

(state)

38117

(zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 02 August 2012

(day)

(month)

(year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about \_\_\_\_\_

(day)

(month)

(year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 31 August 2012

(day)

(month)

(year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 19 June 2013. (Attach a copy of the notice to this complaint.)

(day) (month) (year)

9. Because of plaintiff's (1) X race, (2) \_\_\_ color, (3) \_\_\_ sex, (4) \_\_\_ religion, (5) \_\_\_ national origin, defendant

(a) \_\_\_ failed to employ plaintiff.

(b) \_\_\_ terminated plaintiff's employment.

(c) \_\_\_ failed to promote plaintiff.

(d) X training program - Series 99

10. The circumstances under which defendant discriminated against plaintiff were as follows: On or around August 2<sup>nd</sup> and 3<sup>rd</sup> 2012 I was denied the opportunity to take the Series 99 exam. I was advised that it is a compliance issue and that only supervisors can take the test. However, I am aware some or all non-supervisory white employees have been allowed to take the test and none of the non-supervisory black employees were allowed to take Series 99 exam.

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11. The acts set forth in paragraph 9 of this complaint

- (a) ☒ are still being committed by defendant.  
(b) ☐ are no longer being committed by defendant.  
(c) ☐ may still be being committed by defendant.

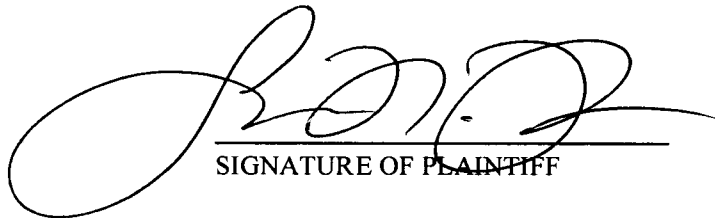
12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☐ Defendant be directed to employ plaintiff, or  
(b) ☐ Defendant be directed to re-employ plaintiff, or  
(c) ☐ Defendant be directed to promote plaintiff, or;  
(d) ☒ Defendant be directed to pay damages
- 
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and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ☒ No ☐

  
SIGNATURE OF PLAINTIFF